

Louis S. Ederer (LE 7574)
John Maltbie (JM 3658)
ARNOLD & PORTER LLP
399 Park Avenue
New York, New York 10022
Phone (212) 715-1000
Fax (212) 715-1399

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
GUCCI AMERICA, INC.,

Plaintiff,

- against -

JENNIFER GUCCI, JENCO DESIGNS, LLC,
JENNICOR, LLC, JENNY GUCCI COFFEE
AND GELATO COMPANY, INC., EDWARD
LITWAK d/b/a ED LITWAK & ASSOCIATES,
GEMMA GUCCI, GEMMA GUCCI COFFEE
AND GELATO COMPANY, INC., ABC
CORPORATIONS 1-10, and JOHN DOES 1-10,

Defendants.
----- X

Civil Action No. 07 Civ. 6820 (RMB)

**PLAINTIFF'S REPLY
MEMORANDUM OF LAW IN
FURTHER SUPPORT OF ITS
MOTION *IN LIMINE* TO
PRECLUDE TESTIMONY OF
DEFENDANT JENNIFER GUCCI
CONCERNING SPOILIATED
EVIDENCE**

EXHIBIT B

ARNOLD & PORTER LLP

Louis S. Ederer
Louis.Ederer@aporter.com

212.715.1102
212.715.1399 Fax

399 Park Avenue
New York, NY 10022-4690

July 30, 2007

BY FEDEX

Ms. Jennifer Gucci
Jenco Design, LLC
Jennicor, LLC
81 Main Street, Suite 215
White Plains, New York 10601

Mr. Edward Litwak
Ed Litwak & Associates
12868 Via Latina
Del Mar, California 92014

Re: Gucci America, Inc. v. Jennifer Gucci, et al.
Civil Action No. 07 CV 6820 (RMB) (SDNY)

Dear Ms. Gucci and Mr. Litwak:

We represent Gucci America, Inc. ("Gucci"), owner of the famous GUCCI brand name, in intellectual property matters.

This is to advise you and the companies Jenco Designs, LLC and Jennicor, LLC, and any other companies affiliated or associated with either of you, that Gucci has this day filed a complaint against you and these companies, and other defendants, in the United States District Court, Southern District of New York, concerning the licensing, manufacture and sale of products and materials bearing the name "Jennifer Gucci". A copy of the complaint is enclosed. The complaint has been sent to our firm's process servers and will be formally served shortly.

You and your companies are being sued because it has come to our client's attention that you are or will be licensing, manufacturing, marketing and/or selling consumer products bearing the name and brand JENNIFER GUCCI, and other designations and indicia that imitate well-known Gucci trademarks. As indicated in the enclosed complaint, Gucci considers such conduct to be an intentional infringement of its valuable trademark rights. Gucci accordingly demands that you immediately cease and desist from all further activity with respect to such products, and that you confirm in writing that you have done so. We further ask that you provide us with a complete list of all parties who have been issued licenses or sublicenses to use the "Jennifer Gucci" name

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Mr. Edward Litwak
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on consumer products, and that you notify each of them in writing to refrain from any such further activity. Should you refuse to accede to these demands, Gucci reserves the right to immediately move the Court for preliminary relief.

Also enclosed is a copy of an Order to Show Cause submitted today to the Court on Gucci's motion to take expedited discovery of you, your companies, and the other defendants in this case. We have been informed that the Court, by Magistrate Judge James C. Francis, intends to hold a hearing on the motion on Friday, August 3, 2007, at 2:30 p.m. Eastern time. The Court has indicated that your lawyer can participate by telephone if he is not located in New York. We will provide you with a copy of the signed Order to Show Cause when we receive it from the Court.

We urge you to have your attorneys contact the undersigned immediately with respect to this matter, and to provide our client with the written assurances we have requested. All rights and remedies that may be available to Gucci are hereby expressly reserved.

Your truly,

ARNOLD & PORTER LLP

By: 
Louis S. Ederer

cc: Gucci America, Inc.

Encls.